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**FILED**

**APR 06 2018**

Clerk, U.S. District Court  
District Of Montana  
Great Falls

**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BUTTE DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**ADAM WALTER CAMPBELL,**

**Defendant.**

**CR 18-OSBU-DLC**

**INDICTMENT**

**CONSPIRACY TO MANUFACTURE  
AND DISTRIBUTE CONTROLLED  
SUBSTANCES**

**(Count I)**

**Title 21 U.S.C. § 846**

**(Penalty for marijuana plants: Mandatory  
minimum ten years to life imprisonment,  
\$10,000,000 fine, and at least five years  
supervised release)**

**(Penalty for hash oil: 20 years  
imprisonment, \$1,000,000 fine, and at least  
three years supervised release)**

**POSSESSION WITH INTENT TO  
DISTRIBUTE MARIJUANA**

**(Count II)**

**Title 21 U.S.C. § 841(a)(1) and**

**Title 18 U.S.C. § 2**

	<p><b>(Penalty for marijuana plants: Mandatory minimum ten years to life imprisonment, \$10,000,000 fine, and at least five years supervised release)</b></p> <p><b>(Penalty for hash oil: 20 years imprisonment, \$1,000,000 fine, and at least three years supervised release)</b></p> <p><b>MAINTAINING DRUG-INVOLVED PREMISES</b> <b>(Count III)</b> <b>Title 21 U.S.C. § 856 and</b> <b>Title 18 U.S.C. § 2</b> <b>(Penalty: 20 years imprisonment, \$500,000 fine, and at least three years supervised release)</b></p> <p><b>FORFEITURE</b> <b>21 U.S.C. § 853</b></p> <p><b>TITLE 21 PENALTIES MAY BE ENHANCED FOR PRIOR DRUG RELATED FELONY CONVICTIONS</b></p>
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**THE GRAND JURY CHARGES:**

**COUNT I**

That beginning in approximately 2010 and continuing until on or about May 18, 2016, at Bozeman, in Gallatin County, in the State and District of Montana, and elsewhere, including California and Ohio, the defendant, ADAM WALTER CAMPBELL, knowingly and unlawfully conspired and agreed with other persons, both known and unknown to the Grand Jury, to manufacture and distribute, in violation of 21 U.S.C. § 841(a)(1), more than 1,000 marijuana plants, and

marijuana in the form of butane hash oil, Schedule I controlled substances, in violation of 21 U.S.C. § 846.

#### COUNT II

That beginning in approximately 2010 and continuing until on or about May 18, 2016, at Bozeman, in Gallatin County, in the State and District of Montana, and elsewhere, including California and Ohio, the defendant, ADAM WALTER CAMPBELL, knowingly possessed, with the intent to distribute, more than 1,000 marijuana plants, and marijuana in the form of butane hash oil, Schedule I controlled substances, and aided and abetted the same, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

#### COUNT III

That beginning in approximately 2010 and continuing until on or about May 18, 2016, at Bozeman, in Gallatin County, and elsewhere in the State and District of Montana, the defendant, ADAM WALTER CAMPBELL, knowingly and unlawfully used and maintained places located at 152 Zoot Way, 154 Zoot Way, and 160 Zoot Way, in Bozeman for the purpose of manufacturing and distributing marijuana, a Schedule I controlled substance, and aided and abetted the same, in violation of 21 U.S.C. § 856(a)(1) and 18 U.S.C. § 2.

## FORFEITURE ALLEGATION

1. The allegations contained in Counts I, II, and III of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

2. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. §§ 841, 846, and 856 the defendant, ADAM WALTER CAMPBELL, shall forfeit to the United States of America any property constituting and derived from any proceeds obtained, directly and indirectly, as the result of such offenses and any property used and intended to be used, in any manner or part, to commit and to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

### A. REAL PROPERTY

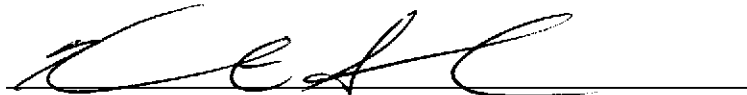
- (1) Commercial property located at 152 Zoot Way, Bozeman, Montana;
- (2) Commercial property located at 154 Zoot Way, Bozeman, Montana;

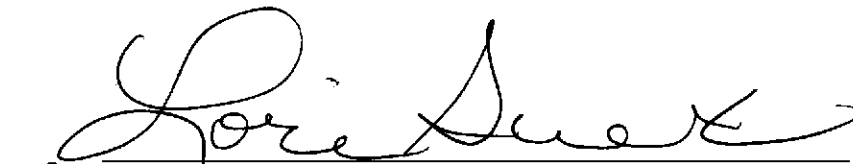
3. the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), if any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

  
KURT G. ALME  
United States Attorney

  
JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney

Crim. Summons \_\_\_\_\_  
Warrant: ☒ \_\_\_\_\_  
Bail: \_\_\_\_\_